

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

|                                      |   |                            |
|--------------------------------------|---|----------------------------|
| Latrenda Leverett,                   | ) |                            |
|                                      | ) |                            |
| Plaintiff,                           | ) | C/A No.: 3:15-cv-02626-MGL |
|                                      | ) |                            |
| v.                                   | ) |                            |
|                                      | ) |                            |
| Great Lakes Educational Loan         | ) |                            |
| Services, Inc., Trans Union, LLC and | ) |                            |
| Experian Information Solutions, LLC, | ) |                            |
|                                      | ) |                            |
| Defendant.                           | ) |                            |
| _____                                | ) |                            |

**DEFENDANT GREAT LAKES EDUCATIONAL LOAN SERVICES, INC.’S  
RESPONSES TO S.C. LOCAL RULE 26.01 INTERROGATORIES**

Pursuant to S.C. Local Civil Rule 26.01, Defendant Great Lakes Educational Loan Services, Inc.’s (“GLELSI”) answers as follows:

- (A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER: GLELSI is not aware of any at this time.**

- (B) As to each claim, state whether it should be tried jury or non-jury and why.

**ANSWER: Plaintiff has requested a jury trial. Therefore, the matter should be tried by a jury.**

- (C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of

the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

**ANSWER: GLELSI is not a publicly owned company, no publicly held corporation owns 10% or more of GLELSI's stock nor does GLELSI own 10% or more of any publicly owned company.**

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: On May 22, 2015, the subject case was originally filed in the South Carolina Court of Common Pleas for the Fifth Judicial Circuit in the County of Richland. On July 1, 2015, Defendant Trans Union, LLC, with consent of all Defendants, removed the case to the Columbia Division of the United States District Court for the District of South Carolina as the Plaintiff allegedly resides therein. At this time, GLELSI does not challenge the appropriateness of the division.**

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER: No.**

- (F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: “Great Lakes Educational Loan Services, Inc.” is properly identified.**

- (G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting the claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: GLELSI asserts Plaintiff and/or the Plaintiff’s ex-husband, Mr. Isaac Lee, III, may have liability for action or inaction related to Plaintiff’s alleged claims. Beyond Plaintiff, and allegedly the other named Defendants, GLELSI is not aware of any other such person or legal entity at this time.**

Respectfully submitted,

July 8, 2015.

Respectfully submitted,

s/ Chad V. Echols

Chad V. Echols (Fed ID No. 9810)  
Bess D. Lochocki (Fed ID No. 12042)  
The Echols Firm, LLC  
Post Office Box 12645  
115 Oakland Ave. Suite 102 (29730)  
Rock Hill, South Carolina 29731  
803-329-8970  
[chad.echols@theecholsfirm.com](mailto:chad.echols@theecholsfirm.com)  
[bess.lochocki@theecholsfirm.com](mailto:bess.lochocki@theecholsfirm.com)  
ATTORNEY FOR DEFENDANT  
GREAT LAKES EDUCATIONAL  
LOAN SERVICES, INC.

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| _____                                | ) |                            |

**CERTIFICATE OF SERVICE**

The undersigned certifies that Great Lakes Education Loan Services, Inc.'s **Responses to S.C. Local Rule 26.01 Interrogatories** were served upon Plaintiff's counsel and all counsel of record on the 8<sup>th</sup> day of July, 2015 by electronic mail through the Clerk of Court's ECF System addressed as:

David A. Maxfield  
Dave Maxfield, Attorney at Law, LLC  
5217 N. Trenholm Road, Suite B  
Columbia, SC 29206  
(803) 509-6800  
(855) 299-1656 Fax  
[dave@consumerlawsc.com](mailto:dave@consumerlawsc.com)  
COUNSEL FOR PLAINTIFF

Wilbur E. Johnson  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
(843) 724-6659  
(843) 579-1332 Fax  
[wjohnson@yclaw.com](mailto:wjohnson@yclaw.com)  
COUNSEL FOR TRANS UNION, LLC

Dawn M. Hardesty  
Adams and Reese LLP  
1501 Main Street, 5<sup>th</sup> Floor  
Columbia, SC 29201  
(803) 212-4412  
(803) 212-1344 Fax  
[dawn.hardesty@arlaw.com](mailto:dawn.hardesty@arlaw.com)  
COUNSEL FOR EXPERIAN  
INFORMATION SOLUTIONS, LLC

s/ Chad V. Echols  
Chad V. Echols (Fed. I.D. No. 9810)  
The Echols Firm, LLC